

1 HEATHER E. WILLIAMS, CA Bar #122664  
Federal Defender  
2 ERIN SNIDER, CA Bar #304781  
Assistant Federal Defender  
3 Office of the Federal Defender  
2300 Tulare Street, Suite 330  
4 Fresno, CA 93721-2226  
Telephone: (559) 487-5561  
5 Fax: (559) 487-5950

6 Attorneys for Defendant  
KENNETH GOULD  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KENNETH GOULD,

15 Defendant.  
16

Case No. 1:21-cr-00243-JLT-SKO

**STIPULATION TO CONTINUE STATUS  
CONFERENCE; ORDER**

Date: March 15, 2023

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant  
19 Federal Defender Erin Snider, counsel for Kenneth Gould, that the status conference currently  
20 scheduled for November 30, 2022, at 1:00 p.m. may be continued to March 15, 2023, at 1:00  
21 p.m.

22 The parties agree and request that the Court make the following findings:

- 23 1. By previous order, this matter was set for a status conference on November 30,  
24 2022.
- 25 2. The government has produced 21,658 bates-marked items in this matter.
- 26 3. Counsel for Mr. Gould requires additional time to review discovery, consult with  
27 her client regarding the case, and conduct necessary investigation.
- 28 4. Counsel for Mr. Gould believes that failure to grant the above-requested

1 continuance would deny her the reasonable time necessary for effective preparation, taking into  
2 account the exercise of due diligence.

3 5. The government does not object to the continuance.

4 6. Based on the above-stated findings, the ends of justice served by continuing the  
5 case as requested outweigh the interest of the public and the defendant in a trial within the  
6 original date prescribed by the Speedy Trial Act.

7 7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
8 *et seq.*, within which trial must commence, the time period of November 30, 2022, to March 15  
9 2023, inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

10 **IT IS SO STIPULATED.**

11 Respectfully submitted,

12  
13 PHILLIP A. TALBERT  
United States Attorney

14 Date: November 22, 2022

/s/ Joseph Barton  
JOSEPH BARTON  
Assistant United States Attorney  
Attorney for Plaintiff

17 HEATHER E. WILLIAMS  
18 Federal Defender

19 Date: November 22, 2022

/s/ Erin Snider  
ERIN SNIDER  
Assistant Federal Defender  
Attorney for Defendant  
KENNETH GOULD

**ORDER**

**IT IS SO ORDERED.** The status conference currently scheduled for November 30, 2022, at 1:00 p.m. is hereby continued to March 15, 2023, at 1:00 p.m. Time is excluded.

IT IS SO ORDERED.

Dated: **November 22, 2022**

/s/ Eric P. Groj  
UNITED STATES MAGISTRATE JUDGE